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UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

IN RE:	§	
	§	
PRIMERA ENERGY, LLC	§	CASE NO. 15-51396
21022 Gathering Oak #2101	§	
San Antonio, Texas 78260	§	
BEXAR-TX	§	
Tax ID / EIN: 20-2950313	§	
	§	
DEBTOR.	§	CHAPTER 11

**TRUSTEE'S MOTION TO SELL PROPERTY, FREE AND CLEAR  
OF LIENS, TO FELDERHOFF BROS. DRILLING CO., INC.**

NOW COMES JASON R. SEARCY, CHAPTER 11 TRUSTEE for Primera Energy, LLC (the "Trustee" and/or "Applicant"), and makes this his Motion to Sell Property, Free and Clear of Liens, to Felderhoff Bros., Drilling Co., Inc. (the "Sale Motion"); and in support thereof respectfully represents as follows:

***THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS.***

***IF NO TIMELY RESPONSE IS FILED WITHIN 21 DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.***

***A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD***

I.

1.1. The Court has jurisdiction over this proceeding pursuant to 28 U.S.C. § 1334.

This is a core proceeding under 28 U.S.C. § 157. Venue is appropriate under 28 U.S.C. §§ 1409 and 1409.

II.

2.1. On June 3, 2015, an Order for Relief under Chapter 11 of the United States Bankruptcy Code was entered against **Primera Energy, LLC** (the “Debtor”). On July 10, 2015, the U.S. Trustee filed an Application to appoint a Trustee for this case; and subsequent thereto, on July 13, 2015, Jason R. Searcy was appointed to serve as the Trustee. Jason R. Searcy is the duly appointed and serving Chapter 11 Bankruptcy Trustee for the above-named Debtor.

III.

3.1. A portion of the Debtor’s estate consists of certain oil and gas properties being generally described as follows:

1) Oil and Gas Lease dated April4, 2011 from Jerry Hall, Lessor to Giant Resources, LP as Lessee, describing 80 acres of land, being the southwest one-half (SW/2) of Survey No. 55 out of the Panola County School Land Survey, A-587, Montague County, Texas, a Memorandum of said lease recorded in Volume 564, Page 268 of the Official Records of Montague County, Texas.

2) Oil and Gas lease dated April 4, 2011 from Jerry Hall, Lessor to Giant Resources, LP as lessee, describing 112 acres of land in Block No. 46 of the Panola County School Land Survey, A-587, and 131 acres of land in Block No. 47 of the Panola County School land Survey, A-587, both in Montague County, Texas, a Memorandum of said Lease recorded in Volume 564, Page 271 of the Official Records of Montague County, Texas.

3) Oil and Gas lease dated April4, 2011 from Jerry Hall, Lessor to Giant Resources, LP as lessee, describing 105 acres of land in Block No. 58 of the Panola County School Land Survey, A-587, Montague County, Texas, a Memorandum of said Lease recorded in Volume 564, Page 274 of the Official Records of Montague County, Texas.

4) Oil and Gas Lease dated April 4, 2011 from Jerry Hall, Lessor to Giant Resources, LP as lessee, describing 80 acres of land, being the northwest one-half (NW/2) and the southeast one-half (SE/2) of Survey No. 38 of the Panola County School Land Survey, A-587, Montague County, Texas, a Memorandum of said Lease recorded in Volume 564, Page 277 of the Official Records of Montague County, Texas.

5) Oil and Gas Lease dated April 4, 2011 from Jerry Hall, Lessor to Giant Resources, LP as Lessee, describing 80 acres of land, being part of Block No. 45 of the Panola County School Land Survey, A-587, Montague County, Texas, a Memorandum of said Lease recorded in Volume 564, Page 280 of the Official Records of Montague County, Texas.

6) Oil and Gas Lease dated April 4, 2011 from Carolyn Hall Young, Lessor to Giant Resources, LP as Lessee, describing 80 acres of land, being the northwest one-half (NW/2) and the southeast one-half (SE/2) of Survey No. 38 of the Panola County School Land Survey, A-587, Montague County, Texas, a Memorandum of said Lease recorded in Volume 564, Page 283 of the Official Records of Montague County, Texas.

7) Oil and Gas Lease dated April 4, 2011 from Carolyn Hall Young, Lessor to Giant Resources, LP as Lessee, describing 112 acres of land in Block No. 46 of the Panola County School Land Survey, A-587, and 131 acres of land in Block No. 47 of the Panola County School Land Survey, A-587, both in Montague County, Texas, a Memorandum of said Lease recorded in Volume 564, Page 286 of the Official Records of Montague County, Texas.

8) Oil and Gas lease dated April 4, 2011 from Carolyn Hall Young, Lessor to Giant Resources, LP as Lessee, describing 80 acres of land, being the southwest one-half (SW/2) of Survey No. 55 out of the Panola County School Land Survey, A-587, Montague County, Texas, a Memorandum of said lease recorded in Volume 564, Page 289 of the Official Records of Montague County, Texas.

9) Oil and Gas lease dated April 4, 2011 from Carolyn Hall Young, lessor to Giant Resources, LP as lessee, describing 80 acres of land, being part of Block No. 45 of the Panola County School Land Survey, A-587, Montague County, Texas, a Memorandum of said Lease recorded in Volume 564, Page 292 of the Official Records of Montague County, Texas.

10) Oil and Gas Lease dated April 8, 2011 from Youngblood Ltd. To Giant Resources, LP describing 80 acres of land, being part of Block No. 45 of the Panola County School Land Survey, A-587, Montague County, Texas, and recorded in Volume 569, Page 439 of the Official Records of Montague County, Texas. The above leases lie within the proration units for the Legacy #1H Well,

API #42-337-34587 and the Legacy #2H Well, API #42-337-34589.

IV.

4.1. The Trustee has been tendered an offer of sale of the above-described oil and gas properties by virtue of a Purchase and Sale Agreement (the "P & S Agreement") in the amount of \$497,500.00 (the "Purchase Price") from Felderhoff Bros. Drilling Co., Inc. ("Felderhoff") whose address is P.O. Box 430, Muenster, Texas 76552. A true and correct copy of the P & S Agreement is attached hereto as **Exhibit A** and incorporated herein for all purposes

4.2. The Trustee desires to accept the P & S Agreement and sell the above-described oil and gas properties pursuant to the terms and conditions of the P & S Agreement. The sale is proposed to be free and clear of all liens, claims and encumbrances with any valid liens, claims or encumbrances attaching to the sale proceeds.

4.3. The Trustee further desires that the marketing firm, PLS, Inc., receive it's fee of \$25,000.00 plus 4% of the purchase price at the closing of the sale in the total amount of \$44,900.00 for assisting in the sale of the oil & gas properties.

V.

5.1. To the best of Trustee's knowledge and belief, the prospective purchaser, Felderhoff, is a disinterested party as defined in 11 U.S.C. § 101(14).

**WHEREFORE PREMISES CONSIDERED**, Trustee prays for an Order of this Court 1) approving the sale of the above-described oil and gas properties free and clear of liens, claims and encumbrances in accordance with the provisions of this Sale Motion and under the terms and conditions set out in the P & A Agreement attached hereto as **Exhibit A**; 2) allowing PLS, Inc. to receive it's fee of

\$25,000.00 plus 4% of the purchase price in the total amount of \$44,900.00; and 3) for such other and further relief as is just.

**DATED** February 18, 2016.

Respectfully submitted,  
***SEARCY & SEARCY, P.C.***

/S/ Jason R. Searcy  
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ATTORNEYS FOR CHAPTER 11 TRUSTEE

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing document has been forwarded via electronic mail, if available, and/or via regular mail, postage prepaid to each interested party shown below; and was served via regular first class mail to each party shown on the attached Master Service List on or before February 18, 2016 by the service agent, Certificateofservice.com.

/s/ Jason R. Searcy

Jason R. Searcy

Felderhoff Bros. Drilling Co., Inc.  
P.O. Box 430  
Muenster, Texas 76552

PLS, Inc.  
One Riverway, Ste. 2500  
Houston, Texas 77056